

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

JLR GLOBAL, LLC, et al.

Plaintiffs,

v.

PAYPAL, INC.,

Defendant.

CIVIL ACTION NO.: 4:22-cv-559

JURY TRIAL DEMANDED

**PLAINTIFFS' UNOPPOSED EMERGENCY MOTION TO AMEND SCHEDULING
ORDER**

Come now Plaintiffs JLR Global, LLC, Jenna Ryan Realty, LLC, Jenna Ryan Real Estate, LLC, First Place Real Estate, SelfLoveU, LLC, The Jenna Ryan Show, dotJenna, and Jennifer Ryan (collectively “Plaintiffs”) to file this Unopposed Emergency Motion to Amend the Scheduling Order (“Motion to Amend”) (ECF No. 17) already entered in this case (“Order”), and in support thereof would show the Court as follows:

On August 29, 2022, the defendant in this case filed its Motion to Compel Arbitration and Dismiss (“Motion”) (ECF No. 10). That Motion has been fully briefed and is pending.

On November 8, 2022, the defendant in this case filed its Motion to Stay Discovery (“Motion to Stay”) (ECF No. 20). That Motion has been fully briefed and is pending.

The Order currently sets several deadlines that will be next to impossible for Plaintiffs to comply with. For example, the Order sets tomorrow, December 1, as the deadline for disclosure of expert testimony, and December 16 as the deadline for Plaintiffs to file amended pleadings.

Based upon the currently pending motions, Defendant has refused to produce any documents or materials responsive to Plaintiffs’ discovery requests.

Adherence to the Order, as it currently exists, would severely prejudice Plaintiffs’ full and proper preparation of their case, and not serve the interests of justice.

Plaintiffs respectfully submit that there is good cause for granting this Motion to Amend, and request an amended scheduling order to properly and fully prepare their case. In light of the present status of this case, Plaintiffs respectfully submit that the proposed amendments are not excessive.

Plaintiffs respectfully request that this Court grant this Motion to Amend, and enter the proposed Amended Scheduling Order (submitted herewith).

Dated: November 30, 2022

Respectfully Submitted,

By: /s/ Ronald W. Burns

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ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

The undersigned certifies that today, Nov. 30, 2022, he conferred with counsel for the defendant regarding this motion, and they indicated that they are not opposed to this motion or the amended scheduling order.

/s/ Ronald W. Burns

Ronald W. Burns, Esq.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5. As such, the foregoing was served on all counsel of record who have consented to electronic service. Local Rule CV-5(a). Pursuant to Fed. R. Civ. P. 5 and Local Rule CV-5, all others not deemed to have consented to electronic service will be served with a true and correct copy of the foregoing by email, on this the 30th day of November, 2022.

/s/ Ronald W. Burns

Ronald W. Burns, Esq.